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Hearing Date: TBD  
Opposition Date: April 15, 2022  
Reply Date: May 16, 2022

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,	)	
	)	<b>Adv. Pro. No. 08-01789 (CGM)</b>
Plaintiff-Applicant,	)	
	)	<b>SIPA Liquidation</b>
v.	)	<b>(Substantively Consolidated)</b>
	)	
BERNARD L. MADOFF INVESTMENT SECURITIES, LLC,	)	
Defendant.	)	
In re:	)	
	)	
BERNARD L. MADOFF,	)	
	)	
Debtor.	)	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	)	<b>Adv. Pro. No. 12-01207 (CGM)</b>
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
LLOYDS TSB BANK PLC,	)	
	)	
Defendant.	)	

**DECLARATION OF ANTHONY PACCIONE  
IN SUPPORT OF DEFENDANT LLOYDS BANK PLC'S  
MOTION TO DISMISS THE TRUSTEE'S COMPLAINT**

ANTHONY PACCIONE, under penalty of perjury, declares:

1. I am a member of the bar of the State of New York and of this Court and a member of Katten Muchin Rosenman LLP, counsel for defendant Lloyds TSB Bank PLC, now known as

Lloyds Bank plc (“Lloyds”) in this adversary proceeding. I submit this Declaration in support of Lloyds’s motion to dismiss the Complaint (the “Complaint” or “Compl.,” No. 12-1207 ECF 1) filed by plaintiff Irving H. Picard, Trustee (the “Trustee”) for the Liquidation of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and the Estate of Bernard L. Madoff in this proceeding.

2. **Exhibit A** is a true and correct copy of the Fairfield Amended Complaint<sup>1</sup>, *Picard v. Fairfield Sentry Ltd.*, Adv. Proc. No. 09-1239 (Bankr. S.D.N.Y. July 20, 2010), ECF 23 (without exhibits).

3. **Exhibit B** is a true and correct copy the Fairfield Second Amended Complaint, Adv. Proc. No. 09-2139 (Bankr. S.D.N.Y. Aug. 28, 2020), ECF 286.

4. **Exhibit C** is a true and correct copy of the Fairfield Settlement Agreement, *Picard v. Fairfield Sentry Ltd.*, Adv. Proc. No. 09-1239 (Bankr. S.D.N.Y. May 9, 2011), ECF 69-2. This Court approved the Fairfield Settlement Agreement. Adv. Proc. No. 09-1239 (Bankr. S.D.N.Y. June 7, 2011), ECF 92.

5. **Exhibit D** is a true and correct copy of an excerpt from the Declaration of William Hare, counsel for the Fairfield Liquidators, attaching the Memorandum of Association and Articles of Association of Fairfield Sentry Limited, as filed with the Court in *Fairfield Sentry Ltd. v. ABN AMRO Schwiz AG, et al.*, Adv. Pro. No. 10-03636 (Bankr. S.D.N.Y. Oct. 26, 2016), ECF 164 and 164-6.

6. **Exhibit E** is a true and correct copy of an excerpt from Exhibit B to the Complaint, showing the cash withdrawals made from Fairfield Sentry Limited (“Sentry”) accounts at BLMIS

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<sup>1</sup> Capitalized terms not defined in this Declaration have the meaning provided in the concurrently filed *Memorandum of Law in Support of Lloyds’s Motion to Dismiss the Complaint*.

during the period December 11, 2002 through March 15, 2005. There are four accounts, but only the first, No. 1FN012, shows any cash withdrawals made by Sentry.

7. **Exhibit F** is a true and correct copy of excerpts from complaints, or exhibits to complaints, filed by the Trustee in the following adversary proceedings:

<i>Source</i>	<i>Transferee(s)</i>
11-1885 ECF 1-3	Safra New York
11-2537 ECF 1-3	Orbita
11-2538 ECF 1-4	Quilvest
11-2551 ECF 1-4	Delta Bank
11-2569 ECF 1-4	Barclays Spain
11-2569 ECF 1-7	Barclays Suisse
11-2571 ECF 1-4	BPES
11-2572 ECF 1-3	KEB
11-2730 ECF 1-4	ASB
11-2731 ECF 1-3	Trincastar
11-2733 ECF 1-3	Naidot
11-2760 ECF 1-3	ABN Switzerland
11-2763 ECF 1-4	Inteligo
11-2784 ECF 1-3	Somers Dublin
11-2910 ECF 1-3	MLBS
11-2922 ECF 1-3	BJB
11-2923 ECF 1-3	Falcon
11-2925 ECF 1-5	CS Sentry Transferees: Credit Suisse AG; Credit Suisse AG, Nassau Branch; Credit Suisse London Nominees; Credit Suisse (Luxembourg); Credit Suisse, Nassau BranchLATAM Investment Banking; Credit Suisse Nominees (Guernsey); Credit Suisse Wealth Management
11-2929 ECF 1-3	LGT Liechtenstein
12-1002 ECF 1-3	PIFSS
12-1005 ECF 1-6	Sico
12-1019 ECF 1-6	Banco Itau
12-1021 ECF 1-4	Grosvenor Balanced
12-1023 ECF 1-3	Arden Management
12-1046 ECF 1-3	SNS Defendants
12-1048 ECF 1-3	BG Valores
12-1194 ECF 1-3	Kookmin Bank
12-1202 ECF 1-9	Bank Vontobel
12-1205 ECF 1-6	Multi-Strategy Fund
12-1207 ECF 1-3	Lloyds
12-1209 ECF 1-3	BSI
12-1209 ECF 1-4	Banca Del Gottardo

12-1210 ECF 1-14	Schroder & Co. Bank AG
12-1512 ECF 1-6	ZCM
12-1513 ECF 1-3	Citivic
12-1565 ECF 1-6	Standard Chartered Defendants
12-1566 ECF 1-2	UKFP
12-1577 ECF 1-3	UBS Deutschland
12-1670 ECF 1-9	BBH
12-1676 ECF 1-5	Clariden/Bank Leu
12-1677 ECF 1-5	SG Sentry Defendants: Lyxor Premium; SG Audace; SGEquilibrium; SG Premium; SG Suisse, SG UK
12-1680 ECF 1-3	Low Volatility
12-1680 ECF 1-4	Medium Volatility
12-1690 ECF 1-7	EFG Bank
12-1691 ECF 1-4	BD Lux
12-1693 ECF 1-3	Lombard Odier
12-1695 ECF 1-3	Bordier
12-1697 ECF 1-3	ABN AMRO Defendants
12-1698 ECF 1-5	Dexia Fairfield Sentry Defendants: Dexia Banque; Dexia Banque Suisse
12-1699 ECF 1-5	RBC Fairfield Sentry Defendants: Guernroy or RBC-CI; RBC; RBC-Dominion; RBC-Jersey; RBC-Suisse

8. **Exhibit G** is a true and correct copy of the cover page, index, and excerpts from Exhibits 8, 9, 15, 16, 17, and 18 to the Trustee's Amended Complaint against Sentry, *Picard v. Fairfield Sentry Ltd.*, No. 09-1239 (Bankr. S.D.N.Y. July 20, 2010), ECF 23, which is incorporated by reference into the Trustee's Complaint against Lloyds at paragraph 36. These exhibits are identified in the index as redemption confirmations for withdrawals from Sentry made by Fairfield Sigma Limited, Fairfield Lambda Limited, Fairfield Investment Fund Limited, Fairfield Investment Trust, and FIF Advanced, Ltd. The Trustee did not file these exhibits on the Court's ECF system, but instead filed (as 09-1239 ECF 23-1) an index to the exhibits together with a slip sheet stating that the exhibits are available upon request to the Trustee's counsel Baker & Hostetler LLP.

9. Set forth below is a chart summarizing the redemptions from Sentry between August 15, 2003 and March 15, 2005, as alleged in the complaints and/or exhibits thereto set forth

at Exhibits E, F, and G hereto. A straightforward analysis of the transactions shown in Exhibits E, F, and G shows the following:

(a) On July 22, 2003, BLMIS transferred \$25 million to Sentry (Paccione Decl. Ex. E).

(b) On August 15 and September 17, 2003, Sentry paid out \$53.1 million, \$28.1 million more than it had received from BLMIS, thus more than exhausting the funds it had received from BLMIS on July 22, 2003 (Paccione Decl. Exs. F, G):

<i>Date</i>	<i>Recipient</i>	<i>Amount</i>	<i>Source</i>
8/15/2003	Fairfield Sigma	(\$700,000)	09-1239 ECF 23-1 Ex. 8
8/15/2003	Fairfield Lambda	(1,700,000)	09-1239 ECF 23-1 Ex. 9
8/15/2003	Fairfield Investment Fund	(1,100,000)	09-1239 ECF 23-1 Ex. 15
8/15/2003	Quilvest	(113,360)	11-2538 ECF 1-4
8/15/2003	Barclays Suisse	(26,317)	11-2569 ECF 1-7
8/15/2003	MLBS	(265,810)	11-2910 ECF 1-3
8/15/2003	MLBS	(300,750)	11-2910 ECF 1-3
8/15/2003	MLBS	(1,971,100)	11-2910 ECF 1-3
8/15/2003	MLBS	(6,386,104)	11-2910 ECF 1-3
8/15/2003	Credit Suisse London Nominees	(56,410)	11-2925 ECF 1-5
8/15/2003	Credit Suisse London Nominees	(93,224)	11-2925 ECF 1-5
8/15/2003	Credit Suisse AG, Nassau	(149,727)	11-2925 ECF 1-5
8/15/2003	Credit Suisse London Nominees	(154,873)	11-2925 ECF 1-5
8/15/2003	Credit Suisse London Nominees	(708,540)	11-2925 ECF 1-5
8/15/2003	Credit Suisse (Luxembourg)	(1,000,000)	11-2925 ECF 1-5
8/15/2003	Sico	(32,628)	12-1005 ECF 1-6
8/15/2003	Sico	(237,721)	12-1005 ECF 1-6
8/15/2003	Sico	(384,083)	12-1005 ECF 1-6
8/15/2003	BSI	(183,894)	12-1209 ECF 1-3
8/15/2003	BSI	(320,364)	12-1209 ECF 1-3
8/15/2003	ZCM	(130,000)	12-1512 ECF 1-6
8/15/2003	Citivic	(24,238)	12-1513 ECF 1-3
8/15/2003	Citivic	(149,158)	12-1513 ECF 1-3
8/15/2003	UKFP	(66,776)	12-1566 ECF 1-2
8/15/2003	Clariden	(63,113)	12-1676 ECF 1-5
8/15/2003	SG Suisse	(2,865,901)	12-1677 ECF 1-5
8/15/2003	EFG Bank	(150,000)	12-1690 ECF 1-7
8/15/2003	Lombard Odier	(1,584,808)	12-1693 ECF 1-3
8/15/2003	Lombard Odier	(1,598,288)	12-1693 ECF 1-3
8/15/2003	Bordier	(203,079)	12-1695 ECF 1-3

8/15/2003	RBC-Jersey	(50,000)	12-1699 ECF 1-5
8/15/2003	RBC-Dominion	(88,507)	12-1699 ECF 1-5
9/17/2003	Fairfield Sigma	(2,600,000)	09-1239 ECF 23-1 Ex. 8
9/17/2003	Fairfield Sigma	(10,500,000)	09-1239 ECF 23-1 Ex. 8
9/17/2003	Fairfield Lambda	(1,300,000)	09-1239 ECF 23-1 Ex. 9
9/17/2003	Fairfield Lambda	(2,100,000)	09-1239 ECF 23-1 Ex. 9
9/17/2003	Fairfield Investment Fund	(800,000)	09-1239 ECF 23-1 Ex. 15
9/17/2003	Safra New York	(130,664)	11-1885 ECF 1-3
9/17/2003	Safra New York	(146,127)	11-1885 ECF 1-3
9/17/2003	Quilvest	(1,495,385)	11-2538 ECF 1-4
9/17/2003	Delta Bank	(140,353)	11-2551 ECF 1-4
9/17/2003	MLBS	(320,079)	11-2910 ECF 1-3
9/17/2003	MLBS	(964,543)	11-2910 ECF 1-3
9/17/2003	BJB	(18,686)	11-2922 ECF 1-3
9/17/2003	BJB	(1,595,815)	11-2922 ECF 1-3
9/17/2003	Credit Suisse London Nominees	(1,992,900)	11-2925 ECF 1-5
9/17/2003	BSI	(14,015)	12-1209 ECF 1-3
9/17/2003	ZCM	(380,000)	12-1512 ECF 1-6
9/17/2003	Clariden	(35,000)	12-1676 ECF 1-5
9/17/2003	Clariden	(46,398)	12-1676 ECF 1-5
9/17/2003	Clariden	(750,000)	12-1676 ECF 1-5
9/17/2003	SG Suisse	(633,000)	12-1677 ECF 1-5
9/17/2003	Lombard Odier	(140,148)	12-1693 ECF 1-3
9/17/2003	Lombard Odier	(725,171)	12-1693 ECF 1-3
9/17/2003	Bordier	(127,067)	12-1695 ECF 1-3
9/17/2003	Bordier	(3,272,168)	12-1695 ECF 1-3
Total		(\$53,086,292)	

(c) Indeed, from September 18, 2003 to March 14, 2005, Sentry paid out \$494.6

million, without receiving any more funds from BLMIS (Paccione Decl. Exs. F, G):

<i>Date</i>	<i>Recipient</i>	<i>Amount</i>	<i>Source</i>
10/14/2003	Fairfield Sigma	(\$600,000)	09-1239 ECF 23-1 Ex. 8
10/14/2003	Fairfield Lambda	(250,000)	09-1239 ECF 23-1 Ex. 9
10/14/2003	Fairfield Investment Fund	(1,900,000)	09-1239 ECF 23-1 Ex. 15
10/14/2003	Fairfield Investment Fund	(4,000,000)	09-1239 ECF 23-1 Ex. 15
10/14/2003	Fairfield Investment Trust	(50,000)	09-1239 ECF 23-1 Ex. 16
10/14/2003	Quilvest	(178,309)	11-2538 ECF 1-4
10/14/2003	Quilvest	(228,214)	11-2538 ECF 1-4
10/14/2003	Quilvest	(424,544)	11-2538 ECF 1-4
10/14/2003	Barclays Suisse	(268,887)	11-2569 ECF 1-7
10/14/2003	Inteligio	(28,470)	11-2763 ECF 1-4
10/14/2003	MLBS	(295,235)	11-2910 ECF 1-3

10/14/2003	MLBS	(370,819)	11-2910 ECF 1-3
10/14/2003	BJB	(1,792,705)	11-2922 ECF 1-3
10/14/2003	Credit Suisse	(2,000,000)	11-2925 ECF 1-5
10/14/2003	Credit Suisse	(2,149,002)	11-2925 ECF 1-5
10/14/2003	Credit Suisse	(3,500,000)	11-2925 ECF 1-5
10/14/2003	SNS Defendants	(26,405)	12-1046 ECF 1-3
10/14/2003	BSI	(130,355)	12-1209 ECF 1-3
10/14/2003	ZCM	(20,000)	12-1512 ECF 1-6
10/14/2003	ZCM	(150,000)	12-1512 ECF 1-6
10/14/2003	ZCM	(1,060,000)	12-1512 ECF 1-6
10/14/2003	Citivic	(74,500)	12-1513 ECF 1-3
10/14/2003	UKFP	(62,683)	12-1566 ECF 1-2
10/14/2003	UKFP	(1,342,152)	12-1566 ECF 1-2
10/14/2003	Clariden	(99,961)	12-1676 ECF 1-5
10/14/2003	Clariden	(100,000)	12-1676 ECF 1-5
10/14/2003	SG Suisse	(188,201)	12-1677 ECF 1-5
10/14/2003	SG Suisse	(205,713)	12-1677 ECF 1-5
10/14/2003	EFG Bank	(210,928)	12-1690 ECF 1-7
10/14/2003	Lombard Odier	(33,006)	12-1693 ECF 1-3
11/19/2003	Fairfield Sigma	(2,150,000)	09-1239 ECF 23-1 Ex. 8
11/19/2003	Fairfield Investment Fund	(800,000)	09-1239 ECF 23-1 Ex. 15
11/19/2003	Quilvest	(578,080)	11-2538 ECF 1-4
11/19/2003	Barclays Spain	(301,681)	11-2569 ECF 1-4
11/19/2003	Inteligo	(323,839)	11-2763 ECF 1-4
11/19/2003	MLBS	(366,608)	11-2910 ECF 1-3
11/19/2003	BJB	(19,110)	11-2922 ECF 1-3
11/19/2003	BJB	(38,220)	11-2922 ECF 1-3
11/19/2003	BJB	(217,855)	11-2922 ECF 1-3
11/19/2003	BJB	(229,321)	11-2922 ECF 1-3
11/19/2003	Credit Suisse	(100,000)	11-2925 ECF 1-5
11/19/2003	Credit Suisse London Nominees	(519,354)	11-2925 ECF 1-5
11/19/2003	SNS Defendants	(119,438)	12-1046 ECF 1-3
11/19/2003	Lloyds	(239,315)	12-1207 ECF 1-3
11/19/2003	Lloyds	(262,362)	12-1207 ECF 1-3
11/19/2003	Lloyds	(369,904)	12-1207 ECF 1-3
11/19/2003	Lloyds	(473,920)	12-1207 ECF 1-3
11/19/2003	BSI	(225,317)	12-1209 ECF 1-3
11/19/2003	Banca Del Gottardo	(2,039,044)	12-1209 ECF 1-4
11/19/2003	ZCM	(135,000)	12-1512 ECF 1-6
11/19/2003	Citivic	(139,503)	12-1513 ECF 1-3
11/19/2003	UKFP	(29,563)	12-1566 ECF 1-2
11/19/2003	UKFP	(38,010)	12-1566 ECF 1-2
11/19/2003	SG Suisse	(143,326)	12-1677 ECF 1-5
11/24/2003	Lombard Odier	(287,177)	12-1693 ECF 1-3
11/28/2003	Lloyds	(369,904)	12-1207 ECF 1-3

12/18/2003	Fairfield Investment Fund	(1,000,000)	09-1239 ECF 23-1 Ex. 15
12/18/2003	Fairfield Lambda	(175,000)	09-1239 ECF 23-1 Ex. 9
12/18/2003	Quilvest	(1,374,582)	11-2538 ECF 1-4
12/18/2003	Inteligo	(112,664)	11-2763 ECF 1-4
12/18/2003	MLBS	(2,915,888)	11-2910 ECF 1-3
12/18/2003	BJB	(150,000)	11-2922 ECF 1-3
12/18/2003	Credit Suisse AG, Nassau	(25,000)	11-2925 ECF 1-5
12/18/2003	Credit Suisse Nominees	(38,191)	11-2925 ECF 1-5
12/18/2003	Credit Suisse	(350,000)	11-2925 ECF 1-5
12/18/2003	Credit Suisse Nominees	(354,222)	11-2925 ECF 1-5
12/18/2003	Credit Suisse London Nominees	(782,707)	11-2925 ECF 1-5
12/18/2003	SNS Defendants	(27,689)	12-1046 ECF 1-3
12/18/2003	SNS Defendants	(151,809)	12-1046 ECF 1-3
12/18/2003	Lombard Odier	(28,643)	12-1693 ECF 1-3
12/18/2003	Lombard Odier	(530,149)	12-1693 ECF 1-3
12/30/2003	ASB	(990,000)	11-2730 ECF 1-4
1/21/2004	Fairfield Sigma	(8,650,000)	09-1239 ECF 23-1 Ex. 8
1/21/2004	Fairfield Lambda	(275,000)	09-1239 ECF 23-1 Ex. 9
1/21/2004	Quilvest	(9,578)	11-2538 ECF 1-4
1/21/2004	Quilvest	(502,350)	11-2538 ECF 1-4
1/21/2004	Quilvest	(2,003,453)	11-2538 ECF 1-4
1/21/2004	Quilvest	(2,456,944)	11-2538 ECF 1-4
1/21/2004	Delta Bank	(801,964)	11-2551 ECF 1-4
1/21/2004	ASB	(1,000,000)	11-2730 ECF 1-4
1/21/2004	Trincastar	(2,000,000)	11-2731 ECF 1-3
1/21/2004	Somers Dublin	(1,055,648)	11-2784 ECF 1-3
1/21/2004	BJB	(363,980)	11-2922 ECF 1-3
1/21/2004	Credit Suisse Nominees	(38,314)	11-2925 ECF 1-5
1/21/2004	Credit Suisse	(180,000)	11-2925 ECF 1-5
1/21/2004	PIFSS	(20,000,000)	12-1002 ECF 1-3
1/21/2004	SNS Defendants	(157,029)	12-1046 ECF 1-3
1/21/2004	Lloyds	(28,735)	12-1207 ECF 1-3
1/21/2004	ZCM	(1,400,000)	12-1512 ECF 1-6
1/21/2004	Clariden	(36,000)	12-1676 ECF 1-5
1/21/2004	Lombard Odier	(17,241)	12-1693 ECF 1-3
1/21/2004	Lombard Odier	(1,155,302)	12-1693 ECF 1-3
1/21/2004	ABN AMRO Defendants	(750,000)	12-1697 ECF 1-3
1/21/2004	Guernroy or RBC-CI	(50,000)	12-1699 ECF 1-5
2/18/2004	Fairfield Sigma	(2,150,000)	09-1239 ECF 23-1 Ex. 8
2/18/2004	Fairfield Lambda	(100,000)	09-1239 ECF 23-1 Ex. 9
2/18/2004	Quilvest	(114,013)	11-2538 ECF 1-4
2/18/2004	Delta Bank	(53,178)	11-2551 ECF 1-4
2/18/2004	Naidot	(5,900,000)	11-2733 ECF 1-3
2/18/2004	MLBS	(60,000)	11-2910 ECF 1-3
2/18/2004	BJB	(560,784)	11-2922 ECF 1-3

2/18/2004	BJB	(588,688)	11-2922 ECF 1-3
2/18/2004	Credit Suisse	(500,000)	11-2925 ECF 1-5
2/18/2004	SNS Defendants	(136,154)	12-1046 ECF 1-3
2/18/2004	BSI	(15,518)	12-1209 ECF 1-3
2/18/2004	BSI	(34,807)	12-1209 ECF 1-3
2/18/2004	UKFP	(26,105)	12-1566 ECF 1-2
2/20/2004	ZCM	(75,000)	12-1512 ECF 1-6
2/20/2004	ZCM	(75,000)	12-1512 ECF 1-6
2/20/2004	ZCM	(100,000)	12-1512 ECF 1-6
3/18/2004	Fairfield Lambda	(750,000)	09-1239 ECF 23-1 Ex. 9
3/18/2004	Delta Bank	(65,000)	11-2551 ECF 1-4
3/18/2004	Barclays Suisse	(49,529)	11-2569 ECF 1-7
3/18/2004	ASB	(1,500,000)	11-2730 ECF 1-4
3/18/2004	BJB	(1,491,200)	11-2922 ECF 1-3
3/18/2004	Falcon	(38,091,032)	11-2923 ECF 1-3
3/18/2004	Credit Suisse London Nominees	(1,994,006)	11-2925 ECF 1-5
3/18/2004	LGT Liechtenstein	(500,000)	11-2929 ECF 1-3
3/18/2004	SNS Defendants	(770,617)	12-1046 ECF 1-3
3/18/2004	Lloyds	(486,763)	12-1207 ECF 1-3
3/18/2004	BSI	(504,507)	12-1209 ECF 1-3
3/18/2004	UKFP	(94,045)	12-1566 ECF 1-2
3/18/2004	Clariden	(333,442)	12-1676 ECF 1-5
3/18/2004	Clariden	(401,444)	12-1676 ECF 1-5
3/18/2004	SG Suisse	(367,647)	12-1677 ECF 1-5
3/18/2004	EFG Bank	(25,246)	12-1690 ECF 1-7
3/18/2004	EFG Bank	(82,598)	12-1690 ECF 1-7
3/18/2004	ABN AMRO Defendants	(2,000,000)	12-1697 ECF 1-3
3/18/2004	RBC	(1,108,287)	12-1699 ECF 1-5
3/24/2004	Fairfield Sigma	(7,350,000)	09-1239 ECF 23-1 Ex. 8
4/20/2004	Fairfield Sigma	(4,700,000)	09-1239 ECF 23-1 Ex. 8
4/20/2004	Fairfield Sigma	(8,400,000)	09-1239 ECF 23-1 Ex. 8
4/20/2004	Fairfield Lambda	(3,170,000)	09-1239 ECF 23-1 Ex. 9
4/21/2004	FIF Advanced	(700,000)	09-1239 ECF 23-1 Ex. 18
4/21/2004	Quilvest	(414,182)	11-2538 ECF 1-4
4/21/2004	Delta Bank	(27,223)	11-2551 ECF 1-4
4/21/2004	Delta Bank	(244,144)	11-2551 ECF 1-4
4/21/2004	ASB	(1,000,000)	11-2730 ECF 1-4
4/21/2004	Inteligo	(2,183,043)	11-2763 ECF 1-4
4/21/2004	MLBS	(1,236,101)	11-2910 ECF 1-3
4/21/2004	MLBS	(2,220,553)	11-2910 ECF 1-3
4/21/2004	BJB	(495,726)	11-2922 ECF 1-3
4/21/2004	LGT Liechtenstein	(1,186,156)	11-2929 ECF 1-3
4/21/2004	Sico	(272,233)	12-1005 ECF 1-6
4/21/2004	SNS Defendants	(121,532)	12-1046 ECF 1-3
4/21/2004	Lloyds	(133,491)	12-1207 ECF 1-3

4/21/2004	Lloyds	(243,512)	12-1207 ECF 1-3
4/21/2004	Lloyds	(243,512)	12-1207 ECF 1-3
4/21/2004	BSI	(58,336)	12-1209 ECF 1-3
4/21/2004	BSI	(1,356,302)	12-1209 ECF 1-3
4/21/2004	Banca Del Gottardo	(2,135,081)	12-1209 ECF 1-4
4/21/2004	ZCM	(50,000)	12-1512 ECF 1-6
4/21/2004	Standard Chartered Defendants	(23,743)	12-1565 ECF 1-6
4/21/2004	UKFP	(517,699)	12-1566 ECF 1-2
4/21/2004	SG Suisse	(27,466)	12-1677 ECF 1-5
4/21/2004	SG Suisse	(194,452)	12-1677 ECF 1-5
4/21/2004	SG UK	(3,822,408)	12-1677 ECF 1-5
4/21/2004	EFG Bank	(18,949)	12-1690 ECF 1-7
4/21/2004	EFG Bank	(32,969)	12-1690 ECF 1-7
4/21/2004	EFG Bank	(63,012)	12-1690 ECF 1-7
5/10/2004	UBS Deutschland	(869,312)	12-1577 ECF 1-3
5/17/2004	Fairfield Sigma	(7,700,000)	09-1239 ECF 23-1 Ex. 8
5/17/2004	Fairfield Lambda	(4,700,000)	09-1239 ECF 23-1 Ex. 9
5/17/2004	Fairfield Investment Fund	(1,700,000)	09-1239 ECF 23-1 Ex. 15
5/17/2004	Quilvest	(213,847)	11-2538 ECF 1-4
5/17/2004	Barclays Spain	(146,471)	11-2569 ECF 1-4
5/17/2004	Barclays Suisse	(107,412)	11-2569 ECF 1-7
5/17/2004	Credit Suisse London Nominees	(34,177)	11-2925 ECF 1-5
5/17/2004	Banco Itau	(298,273)	12-1019 ECF 1-6
5/17/2004	SNS Defendants	(179,222)	12-1046 ECF 1-3
5/17/2004	Citivic	(333,953)	12-1513 ECF 1-3
5/17/2004	UKFP	(57,270)	12-1566 ECF 1-2
5/17/2004	BBH	(110,312)	12-1670 ECF 1-9
5/18/2004	Credit Suisse AG, Nassau	(282,000)	11-2925 ECF 1-5
5/18/2004	Credit Suisse London Nominees	(728,448)	11-2925 ECF 1-5
5/18/2004	Lloyds	(149,916)	12-1207 ECF 1-3
5/18/2004	Lloyds	(489,134)	12-1207 ECF 1-3
6/9/2004	SG Suisse	(4,057,014)	12-1677 ECF 1-5
6/17/2004	Fairfield Sigma	(2,500,000)	09-1239 ECF 23-1 Ex. 8
6/17/2004	Fairfield Lambda	(850,000)	09-1239 ECF 23-1 Ex. 9
6/17/2004	Fairfield Investment Fund	(1,000,000)	09-1239 ECF 23-1 Ex. 15
6/17/2004	FIF Advanced	(1,000,000)	09-1239 ECF 23-1 Ex. 18
6/17/2004	Quilvest	(296,957)	11-2538 ECF 1-4
6/17/2004	MLBS	(304,703)	11-2910 ECF 1-3
6/17/2004	MLBS	(452,140)	11-2910 ECF 1-3
6/17/2004	BJB	(235,899)	11-2922 ECF 1-3
6/17/2004	BJB	(2,424,766)	11-2922 ECF 1-3
6/17/2004	Credit Suisse London Nominees	(19,658)	11-2925 ECF 1-5
6/17/2004	Credit Suisse London Nominees	(180,079)	11-2925 ECF 1-5
6/17/2004	Credit Suisse Nominees	(211,100)	11-2925 ECF 1-5
6/17/2004	Credit Suisse London Nominees	(760,499)	11-2925 ECF 1-5

6/17/2004	BG Valores	(270,301)	12-1048 ECF 1-3
6/17/2004	BSI	(152,892)	12-1209 ECF 1-3
6/17/2004	ZCM	(110,000)	12-1512 ECF 1-6
6/17/2004	UKFP	(27,286)	12-1566 ECF 1-2
6/17/2004	UKFP	(144,242)	12-1566 ECF 1-2
6/17/2004	Clariden	(132,693)	12-1676 ECF 1-5
6/17/2004	Clariden	(168,157)	12-1676 ECF 1-5
6/17/2004	Bank Leu	(184,787)	12-1676 ECF 1-5
6/17/2004	SG Suisse	(917,263)	12-1677 ECF 1-5
6/17/2004	EFG Bank	(1,210,014)	12-1690 ECF 1-7
6/18/2004	Inteligo	(111,040)	11-2763 ECF 1-4
7/16/2004	Fairfield Investment Trust	(1,110,000)	09-1239 ECF 23-1 Ex. 16
7/16/2004	Fairfield Investment Trust	(150,000)	09-1239 ECF 23-1 Ex. 17
7/16/2004	Safra New York	(149,324)	11-1885 ECF 1-3
7/16/2004	Quilvest	(1,260,875)	11-2538 ECF 1-4
7/16/2004	BPES	(209,054)	11-2571 ECF 1-4
7/16/2004	BPES	(721,734)	11-2571 ECF 1-4
7/16/2004	ASB	(2,000,000)	11-2730 ECF 1-4
7/16/2004	Somers Dublin	(630,000)	11-2784 ECF 1-3
7/16/2004	BJB	(167,154)	11-2922 ECF 1-3
7/16/2004	BJB	(376,895)	11-2922 ECF 1-3
7/16/2004	Credit Suisse London Nominees	(796,396)	11-2925 ECF 1-5
7/16/2004	Schroder & Co. Bank AG	(29,865)	12-1210 ECF 1-14
7/16/2004	ZCM	(200,000)	12-1512 ECF 1-6
7/16/2004	UKFP	(62,547)	12-1566 ECF 1-2
7/16/2004	UKFP	(64,647)	12-1566 ECF 1-2
7/16/2004	UKFP	(99,002)	12-1566 ECF 1-2
7/16/2004	UKFP	(129,484)	12-1566 ECF 1-2
7/16/2004	BBH	(258,062)	12-1670 ECF 1-9
7/16/2004	Clariden	(55,698)	12-1676 ECF 1-5
7/16/2004	SG Suisse	(84,926)	12-1677 ECF 1-5
7/16/2004	SG Suisse	(546,099)	12-1677 ECF 1-5
7/16/2004	SG Suisse	(3,597,810)	12-1677 ECF 1-5
7/16/2004	EFG Bank	(376,457)	12-1690 ECF 1-7
7/16/2004	Lombard Odier	(853,110)	12-1693 ECF 1-3
7/16/2004	ABN AMRO Defendants	(1,000,000)	12-1697 ECF 1-3
7/16/2004	RBC-Jersey	(128,459)	12-1699 ECF 1-5
7/22/2004	Guernroy or RBC-CI	(24,965)	12-1699 ECF 1-5
8/13/2004	Fairfield Sigma	(3,200,000)	09-1239 ECF 23-1 Ex. 8
8/13/2004	Fairfield Lambda	(900,000)	09-1239 ECF 23-1 Ex. 9
8/13/2004	Safra New York	(5,000,000)	11-1885 ECF 1-3
8/13/2004	Barclays Suisse	(564,757)	11-2569 ECF 1-7
8/13/2004	BPES	(104,614)	11-2571 ECF 1-4
8/13/2004	ASB	(2,000,000)	11-2730 ECF 1-4
8/13/2004	BJB	(157,858)	11-2922 ECF 1-3

8/13/2004	BJB	(970,192)	11-2922 ECF 1-3
8/13/2004	Credit Suisse AG	(43,918)	11-2925 ECF 1-5
8/13/2004	Credit Suisse AG	(44,835)	11-2925 ECF 1-5
8/13/2004	Credit Suisse London Nominees	(344,519)	11-2925 ECF 1-5
8/13/2004	BSI	(41,846)	12-1209 ECF 1-3
8/13/2004	BSI	(129,522)	12-1209 ECF 1-3
8/13/2004	BSI	(498,163)	12-1209 ECF 1-3
8/13/2004	ZCM	(120,000)	12-1512 ECF 1-6
8/13/2004	UKFP	(25,745)	12-1566 ECF 1-2
8/13/2004	UKFP	(58,435)	12-1566 ECF 1-2
8/13/2004	UKFP	(67,900)	12-1566 ECF 1-2
8/13/2004	UKFP	(126,543)	12-1566 ECF 1-2
8/13/2004	SG Suisse	(399,935)	12-1677 ECF 1-5
8/13/2004	ABN AMRO Defendants	(1,000,000)	12-1697 ECF 1-3
8/31/2004	SG UK	(39,820)	12-1677 ECF 1-5
9/15/2004	Fairfield Sigma	(850,000)	09-1239 ECF 23-1 Ex. 8
9/15/2004	Fairfield Lambda	(115,000)	09-1239 ECF 23-1 Ex. 9
9/15/2004	Fairfield Investment Fund	(2,000,000)	09-1239 ECF 23-1 Ex. 15
9/15/2004	Fairfield Investment Trust	(50,000)	09-1239 ECF 23-1 Ex. 16
9/15/2004	Fairfield Investment Trust	(75,000)	09-1239 ECF 23-1 Ex. 17
9/15/2004	FIF Advanced	(2,400,000)	09-1239 ECF 23-1 Ex. 18
9/15/2004	Safra New York	(6,582,271)	11-1885 ECF 1-3
9/15/2004	Delta Bank	(305,894)	11-2551 ECF 1-4
9/15/2004	Barclays Suisse	(519,454)	11-2569 ECF 1-7
9/15/2004	BJB	(225,685)	11-2922 ECF 1-3
9/15/2004	BJB	(452,329)	11-2922 ECF 1-3
9/15/2004	Credit Suisse London Nominees	(302,865)	11-2925 ECF 1-5
9/15/2004	BG Valores	(666,162)	12-1048 ECF 1-3
9/15/2004	BSI	(132,877)	12-1209 ECF 1-3
9/15/2004	BSI	(506,290)	12-1209 ECF 1-3
9/15/2004	Schroder & Co. Bank AG	(153,189)	12-1210 ECF 1-14
9/15/2004	UKFP	(203,707)	12-1566 ECF 1-2
9/15/2004	SG Suisse	(98,825)	12-1677 ECF 1-5
9/15/2004	Medium Volatility	(3,740,436)	12-1680 ECF 1-4
10/19/2004	Fairfield Investment Trust	(450,000)	09-1239 ECF 23-1 Ex. 17
10/19/2004	FIF Advanced	(500,000)	09-1239 ECF 23-1 Ex. 18
10/19/2004	BPES	(101,489)	11-2571 ECF 1-4
10/19/2004	ASB	(4,000,000)	11-2730 ECF 1-4
10/19/2004	MLBS	(60,893)	11-2910 ECF 1-3
10/19/2004	BJB	(71,042)	11-2922 ECF 1-3
10/19/2004	BJB	(213,127)	11-2922 ECF 1-3
10/19/2004	Credit Suisse London Nominees	(70,027)	11-2925 ECF 1-5
10/19/2004	Credit Suisse Nominees	(131,936)	11-2925 ECF 1-5
10/19/2004	Arden Management	(3,648,658)	12-1023 ECF 1-3
10/19/2004	Arden Management	(4,765,137)	12-1023 ECF 1-3

10/19/2004	SNS Defendants	(99,865)	12-1046 ECF 1-3
10/19/2004	BG Valores	(117,473)	12-1048 ECF 1-3
10/19/2004	UKFP	(28,001)	12-1566 ECF 1-2
10/19/2004	Bank Leu	(304,467)	12-1676 ECF 1-5
10/19/2004	Bank Leu	(507,445)	12-1676 ECF 1-5
10/19/2004	SG Suisse	(37,287)	12-1677 ECF 1-5
10/19/2004	Guernroy or RBC-CI	(25,000)	12-1699 ECF 1-5
11/16/2004	Quilvest	(293,383)	11-2538 ECF 1-4
11/16/2004	BPES	(144,154)	11-2571 ECF 1-4
11/16/2004	KEB	(33,460)	11-2572 ECF 1-3
11/16/2004	MLBS	(91,365)	11-2910 ECF 1-3
11/16/2004	Credit Suisse Nominees	(40,607)	11-2925 ECF 1-5
11/16/2004	Credit Suisse Wealth	(2,793,721)	11-2925 ECF 1-5
11/16/2004	Banco Itau	(25,000)	12-1019 ECF 1-6
11/16/2004	Banco Itau	(418,980)	12-1019 ECF 1-6
11/16/2004	SNS Defendants	(159,128)	12-1046 ECF 1-3
11/16/2004	BSI	(130,276)	12-1209 ECF 1-3
11/16/2004	Citivic	(166,487)	12-1513 ECF 1-3
11/16/2004	UKFP	(30,049)	12-1566 ECF 1-2
11/16/2004	UKFP	(38,302)	12-1566 ECF 1-2
11/16/2004	UKFP	(98,004)	12-1566 ECF 1-2
11/16/2004	Clariden	(50,718)	12-1676 ECF 1-5
11/16/2004	Dexia Banque	(46,627)	12-1698 ECF 1-5
11/16/2004	RBC-Suisse	(441,537)	12-1699 ECF 1-5
12/13/2004	FIF Advanced	(880,000)	09-1239 ECF 23-1 Ex. 18
12/13/2004	Quilvest	(153,477)	11-2538 ECF 1-4
12/13/2004	BPES	(117,665)	11-2571 ECF 1-4
12/13/2004	BPES	(122,781)	11-2571 ECF 1-4
12/13/2004	MLBS	(178,033)	11-2910 ECF 1-3
12/13/2004	MLBS	(200,543)	11-2910 ECF 1-3
12/13/2004	MLBS	(201,566)	11-2910 ECF 1-3
12/13/2004	MLBS	(347,880)	11-2910 ECF 1-3
12/13/2004	MLBS	(404,155)	11-2910 ECF 1-3
12/13/2004	MLBS	(2,455,626)	11-2910 ECF 1-3
12/13/2004	Credit Suisse London Nominees	(15,962)	11-2925 ECF 1-5
12/13/2004	Bank Vontobel	(270,252)	12-1202 ECF 1-9
12/13/2004	ZCM	(90,000)	12-1512 ECF 1-6
12/13/2004	UKFP	(124,889)	12-1566 ECF 1-2
12/13/2004	EFG Bank	(216,914)	12-1690 ECF 1-7
12/13/2004	BD Lux	(115,906)	12-1691 ECF 1-4
12/13/2004	RBC-Suisse	(146,765)	12-1699 ECF 1-5
1/14/2005	Quilvest	(140,214)	11-2538 ECF 1-4
1/14/2005	Quilvest	(652,095)	11-2538 ECF 1-4
1/14/2005	BPES	(22,564)	11-2571 ECF 1-4
1/14/2005	BPES	(51,281)	11-2571 ECF 1-4

1/14/2005	MLBS	(338)	11-2910 ECF 1-3
1/14/2005	MLBS	(177,434)	11-2910 ECF 1-3
1/14/2005	BJB	(275,894)	11-2922 ECF 1-3
1/14/2005	BJB	(633,254)	11-2922 ECF 1-3
1/14/2005	Credit Suisse London Nominees	(352,068)	11-2925 ECF 1-5
1/14/2005	Credit Suisse London Nominees	(653,326)	11-2925 ECF 1-5
1/14/2005	Banco Itau	(263,792)	12-1019 ECF 1-6
1/14/2005	SNS Defendants	(20,513)	12-1046 ECF 1-3
1/14/2005	Kookmin Bank	(1,064,388)	12-1194 ECF 1-3
1/14/2005	Banca Del Gottardo	(122,286)	12-1209 ECF 1-4
1/14/2005	Banca Del Gottardo	(536,927)	12-1209 ECF 1-4
1/14/2005	Schroder & Co. Bank AG	(2,443,798)	12-1210 ECF 1-14
1/14/2005	ZCM	(50,000)	12-1512 ECF 1-6
1/14/2005	UKFP	(51,774)	12-1566 ECF 1-2
1/14/2005	SG Suisse	(1,285,534)	12-1677 ECF 1-5
1/14/2005	Bordier	(6,872)	12-1695 ECF 1-3
1/17/2005	BBH	(235,899)	12-1670 ECF 1-9
1/18/2005	Credit Suisse London Nominees	(89,425)	11-2925 ECF 1-5
2/11/2005	Arden Management	(4,172,864)	12-1023 ECF 1-3
2/16/2005	Fairfield Lambda	(1,400,000)	09-1239 ECF 23-1 Ex. 9
2/16/2005	FIF Advanced	(200,000)	09-1239 ECF 23-1 Ex. 18
2/16/2005	FIF Advanced	(4,580,000)	09-1239 ECF 23-1 Ex. 18
2/16/2005	Orbita	(30,662,226)	11-2537 ECF 1-3
2/16/2005	BPES	(432,963)	11-2571 ECF 1-4
2/16/2005	KEB	(623,600)	11-2572 ECF 1-3
2/16/2005	KEB	(1,870,791)	11-2572 ECF 1-3
2/16/2005	ASB	(22,700,784)	11-2730 ECF 1-4
2/16/2005	Trincastar	(2,000,000)	11-2731 ECF 1-3
2/16/2005	BJB	(451,611)	11-2922 ECF 1-3
2/16/2005	SNS Defendants	(23,710)	12-1046 ECF 1-3
2/16/2005	SNS Defendants	(24,318)	12-1046 ECF 1-3
2/16/2005	BG Valores	(223,491)	12-1048 ECF 1-3
2/16/2005	ZCM	(110,000)	12-1512 ECF 1-6
2/16/2005	SG Suisse	(93,860)	12-1677 ECF 1-5
2/16/2005	EFG Bank	(304,631)	12-1690 ECF 1-7
2/17/2005	Safra New York	(27,149,445)	11-1885 ECF 1-3
2/28/2005	Credit Suisse London Nominees	(10,309)	11-2925 ECF 1-5
3/15/2005	Multi-Strategy Fund	(\$25,763,374)	12-1205 ECF 1-6
3/15/2005	Safra New York	(\$117,162)	11-1885 ECF 1-3
3/15/2005	Safra New York	(351,445)	11-1885 ECF 1-3
3/15/2005	Safra New York	(1,077,355)	11-1885 ECF 1-3
3/15/2005	Safra New York	(1,764,084)	11-1885 ECF 1-3
3/15/2005	BPES	(403,508)	11-2571 ECF 1-4
3/15/2005	KEB	(3,493,631)	11-2572 ECF 1-3
3/15/2005	ASB	(20,185,729)	11-2730 ECF 1-4

3/15/2005	ABN Switzerland	(537,462)	11-2760 ECF 1-3
3/15/2005	MLBS	(162,293)	11-2910 ECF 1-3
3/15/2005	BJB	(103,464)	11-2922 ECF 1-3
3/15/2005	BJB	(181,785)	11-2922 ECF 1-3
3/15/2005	Credit Suisse London Nominees	(25,628)	11-2925 ECF 1-5
3/15/2005	Credit Suisse London Nominees	(2,102,378)	11-2925 ECF 1-5
3/15/2005	Credit Suisse London Nominees	(13,871,693)	11-2925 ECF 1-5
3/15/2005	Banco Itau	(132,951)	12-1019 ECF 1-6
3/15/2005	Banco Itau	(144,704)	12-1019 ECF 1-6
3/15/2005	Banco Itau	(300,000)	12-1019 ECF 1-6
3/15/2005	Grosvenor Balanced	(8,000,000)	12-1021 ECF 1-4
3/15/2005	SNS Defendants	(385,402)	12-1046 ECF 1-3
3/15/2005	BG Valores	(652,565)	12-1048 ECF 1-3
3/15/2005	Lloyds	(264,949)	12-1207 ECF 1-3
3/15/2005	BSI	(52,487)	12-1209 ECF 1-3
3/15/2005	Schroder & Co. Bank AG	(61,043)	12-1210 ECF 1-14
3/15/2005	ZCM	(70,000)	12-1512 ECF 1-6
3/15/2005	SG Suisse	(90,706)	12-1677 ECF 1-5
3/15/2005	Low Volatility	(6,913,079)	12-1680 ECF 1-3
3/15/2005	ABN AMRO Defendants	(1,000,000)	12-1697 ECF 1-3
3/15/2005	Dexia Banque Suisse	(7,408)	12-1698 ECF 1-5
3/15/2005	RBC-Suisse	(17,082)	12-1699 ECF 1-5
Total		\$494,636,548	

(d) Further, BLMIS transferred \$175,000,000 into Sentry on April 1, 2005. (Paccione Decl. Ex. E). But only four days later, Sentry exhausted all of that money: on April 4, 2005, Sentry transferred \$200,000,000 to Defendant Abu Dhabi Investment Authority (“ADIA”). **Exhibit H** is a true and correct copy of an exhibit from *Picard v. ADIA*, Adv. Pro. No. 11-2493-cgm ECF 1-5. This would make it impossible for Sentry’s May 13, 2005 transfer to Lloyds for \$107,030 to have originated with BLMIS when BLMIS’s money was clearly exhausted one month before the Lloyds subsequent transfer. (Compl. Ex. C).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 15, 2022.

/s/ Anthony Paccione  
Anthony Paccione